

**IN THE UNITED STATES DISTRICT COURT FOR THE  
NORTHERN DISTRICT OF ILLINOIS,  
EASTERN DIVISION**

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ALICE WASHINGTON,

Plaintiff,

v.

OFFICE OF THE STATE  
APPELLATE DEFENDER,

Defendant.

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Case No. 1:12-CV-08533

Honorable Rebecca R. Pallmeyer

**PARTIES' PROPOSED FINAL PRE-TRIAL ORDER**

This matter having come before the court and the parties having conferred in anticipation of a pretrial conference to be held pursuant to Fed. R. Civ. P. Rule 16, counsel for Plaintiff, Jawayria, Kalimullah, The Moran Law Group, 309 W. Washington Street, Suite 900, Chicago, Illinois 60606, 312-630-0200, and counsel for Defendant, Helena B. Wright and John Hayes propose the following:

- 1) **This is an action for violations of Title VII of the Civil Rights Act of 1964, as amended under 42 U.S.C. §§ 2000 *et. seq.* ("Title VII"), and Title I of the Americans with Disabilities Act of 1990 ("ADA");**

**Jurisdiction of the Court is invoked under 28 U.S.C. § 1331 for Plaintiff's claims under Title VII and ADA, as these claims involve federal question. Jurisdiction is not disputed.**

- 2) *The following stipulations and statements were submitted and are attached to and made a part of this Order:*

- a. *A comprehensive stipulation or statement of all uncontested facts, which will become a part of the evidentiary record in the case (and which in jury trials, may be read to the jury by the court or any party), attached as **Schedule A**;*
- b. *Short agreed description of the case to be read to prospective jurors, attached as **Schedule B**;*

- c. *Except for rebuttal exhibits or exhibits used solely for impeachment, schedules in the form set out in the attached Schedule C of:*

*(1) all exhibits (all exhibits shall be marked for identification before trial), including documents, summaries, charts and other items expected to be offered in evidence and*

*(2) any demonstrative evidence and experiments to be offered during trial;*

**The parties are in the process of agreeing to Joint Exhibits for trial and shall amend this order to include Joint Exhibits and any separate exhibits, as needed.**

- d. *A list or lists of names and addresses of the potential witnesses to be called by each part, with a statement of any objections to calling, or the qualifications of, any witness identified on the list, attached as **Schedule D**;*
- e. *Stipulations or statements setting forth the qualifications of each expert witness in such form that the statement can be read to the jury at the time the expert witness takes the stand, attached as **Schedule E**;*
- f. *A list of all depositions, and designated page numbers and line numbers to be read into evidence and statements of any objections thereto, attached as **Schedule F**;*
- g. *An itemized statement of damages, attached as **Schedule G**;*
- h. *Not required unless the Court orders the inclusion of this section.*
- i. *A statement that each party has completed discovery, including the depositions of expert witnesses (unless the court has previously ordered otherwise). Absent good cause shown, no further discovery shall be permitted, attached as **Schedule I**;*
- j. *Subject to full compliance with all the procedural requirements of Rule 37(a)(2), a brief summary of intended motions in limine. Any briefs in support of and responses to such motions shall be filed as directed by the Court. See attached as **Schedule J**;*
- k. *An agreed statement or statements by each party of the contested issues of fact and law and a statement or statements of contested issues of fact or law not agreed to, attached as **Schedule K**.*

- 3) **Trial of this case is expected to take 5 days. It is scheduled to begin Monday, November 16, 2015.**

- 4) **Jury [X] Non-Jury [ ]**
- 5) **The parties recommend that 10 jurors be selected at the commencement of the trial.**
- 6) **The parties agree that the issues of liability and damages should not be bifurcated for trial. On motion of any party or on motion of the court, bifurcation may be ordered in either a jury or a non-jury trial.**
- 7) **The parties do not consent to this case being reassigned to a magistrate judge for trial.**
- 8) **This Order will control the course of the trial and may not be amended except by consent of the parties and the court, or by order of the court to prevent manifest injustice.**
- 9) **Possibility of settlement of this case was not previously considered.**

\_\_\_\_\_  
United States District Judge

Date: \_\_\_\_\_

<u>/s/ Jawayria Z. Kalimullah</u> Attorneys for Plaintiff  Jawayria Z. Kalimullah Associate Attorney Moran Law Group 309 W. Washington, Suite 900 Chicago, IL 60606 312.630.0200 <a href="mailto:jawayriak@moranlawgroup.com">jawayriak@moranlawgroup.com</a>	<u>/s/ Helena B. Wright</u> Attorneys for Defendants  Helena B. Wright John Hayes Assistant Attorney General General Law Bureau Office Of The Illinois Attorney General 100 West Randolph Street – 13th Floor Chicago, Illinois 60601 312.814.2035 <a href="mailto:hwright@atg.state.il.us">hwright@atg.state.il.us</a>
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